

Responsible Sourcing requirements for suppliers

Purpose

As a condition of working with Anglo American, suppliers must comply with all relevant laws, industry regulations, policies, site requirements, and other supply conditions. These include the Responsible Sourcing Standard for Suppliers¹ and as applicable The Responsible Commodity Sourcing Policy for Marketing².

This document provides a summary of generalised requirements for all suppliers of goods and services to Anglo American. Suppliers are encouraged to share these requirements with your workforce, and your suppliers and business partners.

Understanding Responsible Sourcing

The Responsible Sourcing Standard for Suppliers¹ ('Standard') has been developed to provide clear guidance on supplier requirements and our expectations.

The Standard is structured across '5 pillars', these include:

1. **Protect safety and health**
Suppliers must protect the safety and health of their workforce – this includes all employees, whether on a permanent, contracted or outsourced basis.
2. **Protect our environment**
Suppliers must work together to understand risks, impacts and opportunities to preserve and restore our environment.
3. **Respect labour and human rights**
Suppliers must respect labour and human rights within the value chain, promote decent work and commit to combatting Modern Slavery
4. **Contribute to thriving communities**
Suppliers are expected to contribute to activities which supports community wellbeing and the protection of heritage.
5. **Conduct all business fairly and with integrity**
Suppliers must conduct business with the utmost integrity and always act in a proper manner, fairly and lawfully.

A summary of the Standard is included on the page 4 of this document, refer to our website for the detailed version.

Our 4 Requirements for all suppliers

Suppliers describes all providers of goods and services to Anglo American and its subsidiaries - this includes all agents, traders, contractors, consultants and other forms of intermediaries. Suppliers act as extensions to the Anglo American Supply Chain and are therefore required to conduct all activities in a responsible, fair and transparent manner.

Supplier contracts and purchase order terms & conditions (T&C's) underpins these expectation for conducting business legally, and in line with our business requirements. Failure to address breaches of legal or Anglo American requirements will result in review and termination of our business relationship.

To this end, in addition to agreed fulfilment of goods and services, supplier are required to demonstrate the following:

1. **Commit to fair and ethical business practices**

As a precondition to supply, suppliers are required to agree to, and comply with relevant laws and Anglo American Policies including the Responsible Sourcing requirements.

- All suppliers are required to agree to legal requirements and company Policies during vendor registration and qualification.
- Current and prospective suppliers are subjected to external checks including sanctions, anti-money laundering, anti-terrorism financing, anti-bribery and corruption.
- Failure to disclose how legal compliance gaps have been addressed, and evidence of steps taken to prevent recurrence will result in a termination of our business relationship.
- Suppliers are encouraged to provide access to grievance mechanisms for your workforce – this could include sharing details of the Anglo American YOURVOICE service⁴.

2. **Complete Self-Assessment Questionnaires (SAQ) and provide requested information**

2.1 **Self-Assessment Questionnaires**

- Suppliers will be required to complete a SAQ using an online platform³, and routinely make updates to the information. A summary of these steps are contained under Appendix 2 of this document.
- This SAQ will be required for supplier operations which provides services, componentry or final assembly of goods provided to Anglo American.

2.2 **Information requests include:**

- Annual updates to your 'Supplier Profile' on our SAP Ariba system.
- As applicable, provision of attestations, or other value chain related disclosures.
- Confirmations of measures undertaken to mitigate the risk of modern slavery, forced labour or other human rights impacts within your value chain.
- Other information needed for disclosure purposes, including modern slavery legislation.

3. 3rd Party assessment

Suppliers may be required to provide evidence of previously conducted responsible sourcing assessments, or be requested to conduct a new 3rd party assessments.

3.1 Assessments of supplier facilities

- **[Preferred]** Certification for responsible sourcing e.g. SA8000, ISO26001.
- Where no certification is available, external (3rd party) assessments are required.
 - These assessments will, at minimum:
 - Be conducted by an APSCA certified social auditor.
 - Conducted within the last 24 months.
 - Conducted against a reputable audit Standard, utilising agreed protocols.
 - The assessment scope will, at minimum, include Responsible Sourcing elements.
- Where no external assessments have been conducted, suppliers are be required to booking an assessment within the next 30 days.

***Note:** To avoid duplication of effort, assesments conducted on behalf of other customers, and provided that the supplier has the right to share the data, could be used as a proxy.*

4. Manage and close-out risk

4.1 Management of risks and breaches

Where risks are identified - including any breaches to legislation or Responsible Sourcing requirements, suppliers are required to:

1. **Immediately informing Anglo American of the risk**
2. **Develop a Corrective Action Plan (CAP)** – these are to contain realistic timelines, steps to be undertaken, and persons responsible for implementation.
3. **Provide feedback and evidence** on the steps being undertaken to adress the risk
4. **Take steps to prevent these issues from re-occurring.**

4.2 Monitor risk close-out and further due diligence

Suppliers are required to monitor committed actions, and where applicable provide feedback on progress to Anglo American.

- Should the nature of risk require verification of completion, the supplier will be required to conduct follow-up assessments with appropriate auditors. The cost for follow-up assessments will be the responsibility of the supplier.

Participating in supplier capability development

Anglo American remains committed to supporting suppliers to manage risk. We invest in capability programmes to support suppliers run sustainable businesses. We will routinely invite suppliers to capability programmes and encourage your participation.

Note: Based on the nature of goods or services provided, we may require suppliers to participate in mandatory training e.g. site safety training and the Anglo American's Code of Conduct.

Further information

The information provided serves as a guide, you are encouraged to review information and requirements on our website or contact a Supply Chain representative for further information.

¹Information on Responsible Sourcing www.angloamerican.com/suppliers/responsible-sourcing

²[Responsible Commodity Sourcing Policy for Marketing \(angloamerican.com\)](http://Responsible Commodity Sourcing Policy for Marketing (angloamerican.com))

³SAQs can be accessed on <https://angloamerican.informed365.com>

⁴YOURVOICE is a confidential whistleblowing channel: www.yourvoice.angloamerican.com

Appendix 1: Summary of the Responsible Sourcing Standard for Suppliers

1. Protect Health and Safety

- 1.1. Maintain a safe and healthy workplace
- 1.2. Maintain evidence of compliance with applicable legislation, regulations and by-laws
- 1.3. Demonstrate zero-tolerance to unsafe behaviour
- 1.4. Conduct safety risk assessments
- 1.5. All employees to be trained in the safe procedures for work
- 1.6. Offer unrestricted access to water and maintain a hygienic workspace
- 1.7. Effectively manage infectious diseases
- 1.8. Improve safety performance
- 1.9. If worker accommodation is provided, evidence is maintained to meet legal, health, safety and fire code requirements.

2. Protect our environment

- 2.1. Demonstrate compliance with all applicable legislation, regulations, by-laws and all applicable guidelines
- 2.2. Conduct risk assessments and manage environmental risks, impacts and opportunities
- 2.3. Use water sparingly and responsibly
- 2.4. Improve circularity
- 2.5. Reduce workplace energy consumption, striving for zero emissions
- 2.6. Take steps to protect biodiversity and combat deforestation
- 2.7. Comply with all Anglo American site requirements

3. Respect labour and human rights

- 3.1. Not use child labour
- 3.2. Combat Modern Slavery – eliminating all trafficked, forced, bonded and involuntary prison labour
- 3.3. Never lodge “security deposits” or retain original worker documents
- 3.4. Oppose unfair or inhumane treatment of the workforce – eliminating all forms of bullying and harassment
- 3.5. Permit freedom of association and allow unrestricted access to confidential grievance mechanisms
- 3.6. Demonstrate that working hours meet legal requirements, with shifts under 12 hours
- 3.7. Maintain evidence that overtime is voluntary, within legal limits and appropriately compensated
- 3.8. Maintain fair and Legal terms of employment
- 3.9. Never make unauthorised or illegal salary deductions
- 3.10. Eliminate irregular employment
- 3.11. Eliminate illegal and unfair discrimination
- 3.12. Promote workplace diversity
- 3.13. Act against Modern Slavery or Human Rights issues in the value chain

4. Contribute to thriving communities

- 4.1. Commit to principles of Inclusive Procurement, seeking to employ within and partner with host community businesses.
- 4.2. Respect the rights of Indigenous communities and individuals
- 4.3. Comply with all site-specific Social Way requirements
- 4.4. Ensure that business related activities do not cause disturbance to cultural artifacts or heritage
- 4.5. For all services rendered on Anglo American sites – maintain evidence of compliance with the Contractor Performance Management Standard
- 4.6. Where used, that all security related personnel are trained in the protection of Human Rights

5. Conduct all business fairly and with integrity

- 5.1. Oppose all forms of bribery
- 5.2. Not offer gifts, entertainment or hospitality to Anglo American employees
- 5.3. Never engage in unfair commercial practices
- 5.4. Manage and declare all conflicts of interest
- 5.5. Maintain data privacy and information security
- 5.6. Demonstrate compliance with anti-money laundering laws, anti-terrorism financing laws, tax and trade regulations
- 5.7. Demonstrate the implementation “whistleblowing” channels
- 5.8. Demonstrate compliance with anti-money laundering laws, anti-terrorism financing laws, tax and trade regulations
- 5.9. Demonstrate the implementation “whistleblowing” channels

Appendix 2: How to register and complete a SAQ using Informed365.com


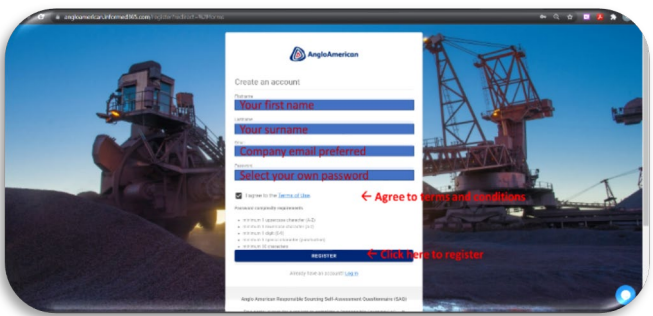
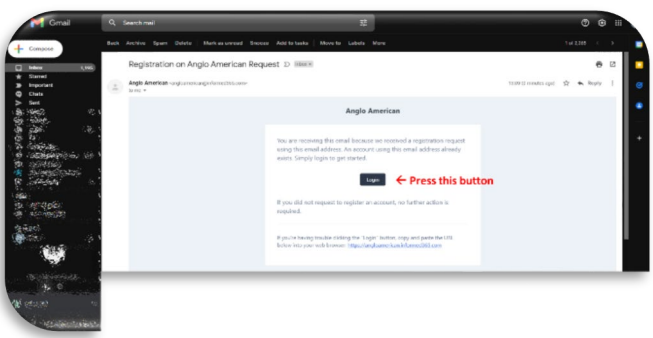
Suppliers are required to complete a self-assessment questionnaire (SAQ), typically you will receive a request from one of our Anglo American colleagues to complete this, with a pre-registered link.

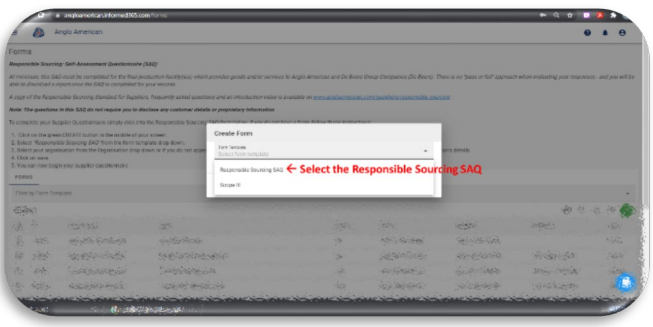
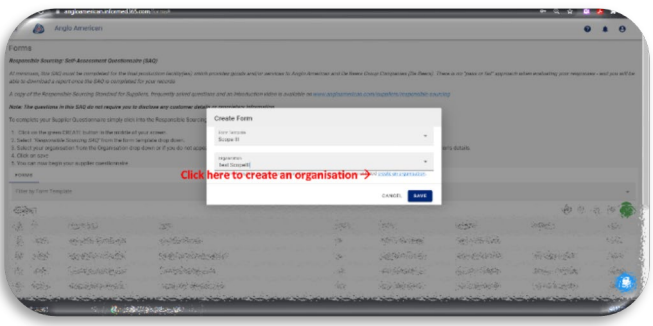
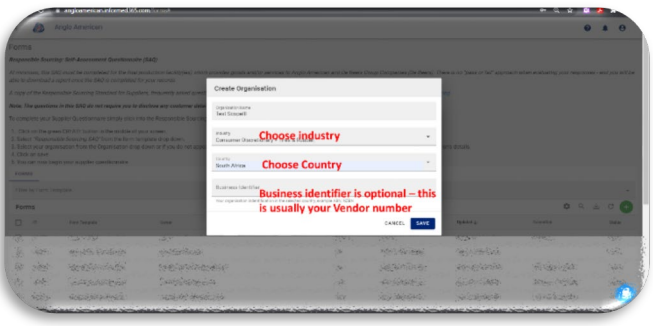
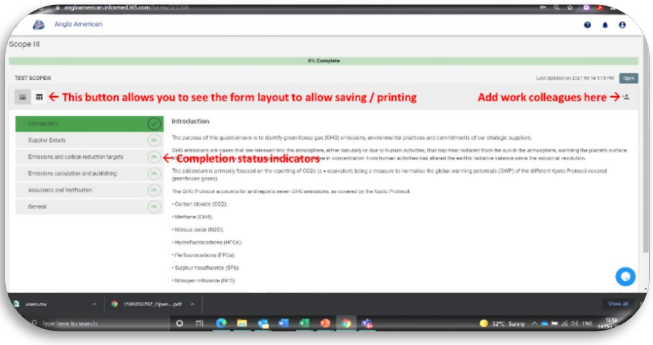
You also have the option of proactively registering on the platform and completing the SAQ without an invitation from Anglo American using the steps outlined below.

About the SAQ process:

1. It is important to recognise that we do not take a “pass or fail” approach to the SAQ and remain committed to working with suppliers who demonstrate effort to improve compliance with responsible sourcing principles.
2. The SAQ can be used as a powerful management tool in your business to understand customer requirements and potential risks – we encourage you to discuss your responses with members of your management team and implement practices to improve workplace conditions.
3. Completing the online SAQ should take approximately 60 minutes. This does not have to be completed in a single sitting, as the system allows you to save your progress.
4. You may also create additional users from your business, and confirm your answers or positions prior to final submission – note that the final submission will be treated as an official representation from your company.
5. Anglo American endeavours to provide feedback to suppliers based on risk identified, and encourage you to upload evidence of completion should risk issues be identified.

How to register and complete the SAQ

1	Access the Informed365 platform	Type in the address on your browser https://angloamerican.informed365.com Note: You may change the language of the SAQ by clicking the translate button on the top right 
2	Create a new user account This requires <ol style="list-style-type: none"> 1. Your first name 2. Your surname 3. Your email address (company email preferred) 4. Choose your own password 5. Agreement to the terms and conditions 	
3	Check your e-mail for a confirmation of registration the login to the platform. Click the “login” button on your email or login the platform manually.	

4	<p>Create your SAQ form</p> <p>Once on the platform you will need to create a SAQ form – these instructions appear on the platform, as a summary:</p> <ol style="list-style-type: none"> 1. Press the green plus '+' button to create your form 2. When the pop-up appears – select "Responsible Sourcing SAQ" 	
5	<p>Link your organisation</p> <p>Your organisation is your company name, this is a very important step to access your form:</p> <ol style="list-style-type: none"> 1. Check if your company name is available on the drop-down menu, if it is then select it and press "save". 2. <i>if you do not see your company name, then see step 5.1 below</i> 	
5.1	<p>If you do not see your company name then create an organisation</p> <ol style="list-style-type: none"> 1. Select "create an organisation" 2. Complete basic details for your company, this includes <ol style="list-style-type: none"> a. Company name b. Your industry c. Country of location d. Business identifier (optional: we suggest using your Vendor number). 	
6	<p>Complete your form.</p> <p>The form allows you to</p> <ol style="list-style-type: none"> 1. See the completion status (a percentage indicator is on the left) 2. Save and print the form 3. Add other work colleagues 	
7	<p>As you complete the various sections – click "next" to proceed to the next section, when done you submit the form*.</p> <p>*Note, Anglo American can only review the form once it is submitted, if you would like to confirm responses with your internal teams then do not click submit unless you are comfortable.</p>	

What happens after your form is submitted

Thank you for completing the SAQ, once the form is received our team will review the form and where necessary, provide you with feedback, this will happen in several ways including:

1. **Anglo American feedback:** You may be contacted by Anglo American to confirm some of your responses – and provide further information.
2. **Automated feedback:** In some cases, the system will email you a report which highlights potentially risks, along with guidance to help mitigate those risks and proposed due dates for completing activities to close-out risk. Should you receive this report, then 1) login, 2) the "Comments" which best describe how you are improving the identified risk, 3) where evidence is required then upload this to the system.